

## **Exhibit C**

**AFFIDAVIT OF TERRY LANDRY**

STATE OF TEXAS

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COUNTY OF MONTGOMERY

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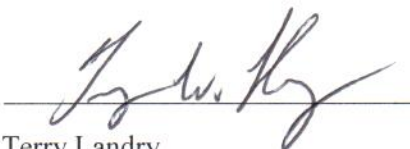
BEFORE ME, THE UNDERSIGNED AUTHORITY, personally appeared TERRY LANDRY, who, after being duly sworn, deposed, and said:

1. My name is Terry Landry. I am over the age of twenty-one (21) years, of sound mind, and in all respects competent to testify. The facts stated herein are true, correct, and within my personal knowledge.
2. I am currently employed as a Senior Consultant at Pathway Forensics, LLC ("Pathway"). In this capacity, I have extensive experience in digital forensics acquisitions and analysis. I have provided expert computer forensic services for business and employment disputes, compliance with discovery requests in litigation, investigations of intellectual property theft, fraud, and family law matters.
3. I am currently an EnCase Certified Forensic Examiner (EnCE), and Magnet Certified Forensic Examiner (MCFE), both of which are internationally recognized computer forensics certifications. I am qualified and experienced with the Cellebrite Universal Forensic Extraction Device (UFED) and Cellebrite Physical Analyzer (PA) software for mobile device forensics. Cellebrite is globally known and utilized by law enforcement, military, and private sector corporations for mobile digital forensics. Further details of my background, experience, and qualifications are included on my CV, which is attached to this affidavit as Exhibit A.
4. The Pathway Forensics office is located at 25700 I-45 North, Suite 175, The Woodlands, Texas 77386.
5. Pathway Forensics provides digital forensics, computer and mobile device investigations, electronic discovery and forensics lab consulting services, including the acquisition, authentication, and analysis of electronic evidence.
6. On Friday May 8, 2020 10:03AM CST Pathway received a computer from custodian Marcus Andrade. Pathway took custody of a Dell Inspiron 24 Model 3455, serial number: CTTQ922 All-in-one desktop computer containing a single 1TB Western Digital model WD10JPVX-75JC3T0 disk drive, serial number: WXR1E25CETXV.
7. The Dell Inspiron 24 All-in-One computer was received with significant pre-existing damage. The screen surface is severely cracked across the entire surface and there is impact damage across the upper middle and top right corner of the screen. The top right corner is shattered and missing part of the glass surface. Lab intake photos of the damage are attached to this affidavit as Exhibit B.
8. A forensic image was taken of the disk drive and analyzed. Pathway concluded that the computer was booted on November 09, 2018 at approximately 11:06 AM PST. There are no other records of activity on this date other than the modification of the logs and system files commonly updated

during the Windows boot process. The dates of activity related to user accounts on the computer indicate user activity up to August 24, 2018 and prior. No user activity is recorded after that date.

9. The forensic image of the disk drive was searched and filtered for non-system audio file types such as user-created audio recordings, voicemail, or recorded calls. Pathway did not find any audio files containing such recordings on the computer.

FURTHER AFFIANT SAYETH NOT.

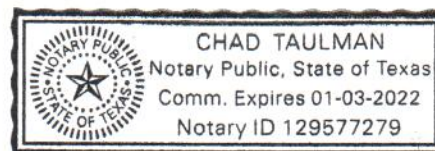
  
Terry Landry

SUBSCRIBED AND SWORN TO before me the undersigned Notary Public on this 8<sup>th</sup> day of June, 2020.



NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS

My Commission Expires: Jan 3, 2022



# EXHIBIT A





# PATHWAY FORENSICS

**B&V Pathway Forensics, LLC**  
Subsidiary of Briggs & Veselka Co.  
25700 I-45 North, Suite 175  
The Woodlands, TX 77386  
Ph: (713) 401-3380

**Terry Landry, EnCE, MCFE**

Senior Consultant

Licensed Private Investigator, State of Texas #4420801

tlandry@pathwayforensics.com

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Terry is a Senior Consultant with Pathway Forensics, where he conducts digital forensics acquisitions and analysis. Prior to joining the firm, Terry was a certified Digital Forensics Investigator and for over ten years provided digital forensics software instruction to both local and foreign law enforcement agencies, local and foreign government and federal agencies, military intelligence and private sector corporate investigators. Terry is a certified EnCase Examiner and Instructor and provided training through Guidance Software and is a licensed Private Investigator by the State of Texas.

## Professional History

### **April 2014 to Present: Senior Consultant, Pathway Forensics**

Provide computer forensics and electronic discovery services including the acquisition, authentication and analysis of electronic evidence to clients across many industries. Design and deliver customized training to corporate clients.

### **January 2003 to April 2014: Senior Digital Forensics Instructor, CyberEvidence, Inc.**

Delivered classroom lecture and practical lab training courses in digital forensics and instruction of the EnCase Forensic software products to members of law enforcement, federal agencies, military intelligence, as well as private sector information systems investigators. Assisted in the acquisitions and analysis of computers and digital devices in corporate computer forensics investigations.

### **August 2000 to December 2002: Senior Software Instructor, Computech Corporation**

Served as a corporate training liaison for key clients providing technical instruction and training classes on a wide variety of Microsoft products, as well as the A+ and Network+ computer and network technician courses

## Education and Training

Bachelor of Arts, Education, Southeastern Louisiana University, 1995

Magnet Forensics Axiom Computer Forensics Training

Guidance Software EnCase Computer Forensics Training

Guidance Software EnCase Computer Forensics Instructor Training

Tableau Basic Forensic Imaging Training

CompTIA A+ and Network+ Certification Courses

## Certifications

Magnet Certified Forensic Examiner (MCFE) 2019 to Present

EnCase Certified Examiner (EnCE), 2003 to Present

COMPTIA A+, Network + Certification



PATHWAY  
FORENSICS

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### **Expert Witness Testimony**

*Expert witness for Thompson & Knight representing E-Z Line Pipe Support Co., LLC*

E-Z Line Pipe Support Co., LLC v. Jeremy Hutson, et al.; Case No. 95413-CV; In the 412<sup>th</sup> Judicial District  
Court of Brazoria County, Texas, March 19, 2018.

# EXHIBIT B



